

EXHIBIT 40

AFFIDAVIT OF GEORGE O'SULLIVAN

1. My name is George O'Sullivan. I am over the age of 18 and am competent to make this declaration. The facts set forth in this declaration are based on my personal knowledge.
2. I am a member of Feds for Medical Freedom.
3. I am a civilian employee with the federal government. I work for the Central Intelligence Agency. I am also a 100% disabled veteran and Purple Heart recipient.
4. I was a Special Agent for the Director's Protective Staff. In 2021, I submitted a request for a religious exemption from the CIA's vaccine mandate. In December 2021, the Religious Accommodation Committee (RAC) said my religious beliefs were strongly held and sincere.
5. But the RAC's only offered accommodations were for me to use my leave time, enter LWOP status, or accept a "reassignment" to a position one grade lower (from GS-14 to GS-13) where I am almost guaranteed not to be promoted and will take a \$60,000 pay cut because overtime is not offered.
6. RAC followed up with a letter indicating that if I declined this offer, I would "be considered non-compliant with Executive Order 140343 [sic] and will be contacted about next steps in the disciplinary process."
7. I felt that I had no choice but to accept the demotion and pay cut because I have to provide for my family.
8. I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 1, 2022

